



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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May 10, 2004

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW.
Washington, DC 20590-0001

RE: FAA Docket No. FAA-2003-16722 and Airspace Docket No. 03-AWP-19

To Whom It May Concern:

The Aircraft Owners and Pilots Association (AOPA), representing over 400,000 general aviation pilots, submits the following comments in support of the proposed changes to Camp Pendleton Special Use Airspace (SUA) near Oceanside, California as referenced in airspace study FAA-2003-16722. While the proposed restricted airspace would replace two existing Military Operations Areas (MOAs), AOPA believes the overall impact of the proposed changes will be less severe than the impact of the current MOA airspace for most general aviation (GA) pilots. However, if the use of this airspace on an operational basis exceeds what was written in the Notice of Proposed Rulemaking (NPRM), AOPA would no longer support the proposal.

The current MOA airspace extends to three miles offshore, pushing GA traffic beyond the personal limitations self-imposed by pilots for over-water flying. The proposed boundary relocation to 1nm offshore is viewed as a positive change for our membership considering the change will allow unimpeded use of the shoreline route for aircraft transiting north/south around the airspace.

The proposal indicates the U.S. Marine Corp will be limited to no more than 20 days of use per year from 0600-2400. The proposed SUA usage coincides with the current MOA use and allows access to the airspace nearly 345 days a year.

According to the Marines and Southern California (SOCAL) Terminal Radar Approach Control (TRACON), instrument procedures into Oceanside Municipal Airport (OCB), McClellan-Palomar Airport (CRQ) and holding over Oceanside VORTAC (OCN) are currently addressed in a Letter of Agreement (LOA) between the military and Federal Aviation Administration (FAA) facilities. Through real-time coordination between the FAA and Marine Air Traffic Control (ATC) facilities, the instrument procedures continue to be conducted even when the SUA airspace is being used by the military. AOPA strongly recommends that the LOA be extended regardless of the airspace designation

and that real-time coordination between the facilities be maintained in order to allow pilots seamless access to the procedures as appropriate.

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In additional discussions with the Marines, AOPA was briefed that multiple offshore waypoints were being established to provide pilots with reference points for transiting the shoreline route. AOPA encourages the Marines to continue the efforts to have those waypoints established and charted to coincide with any charted changes of the SUA area.

AOPA appreciates the efforts undertaken by the Marines to reach out to the pilot community over the past two years through participation in FAA safety seminars, local airport meetings and collaboration with several long-standing local aviation working groups. As a result of those efforts and AOPA's request to have SUA frequencies added to Visual Flight Rules (VFR) charts, the Marines and the FAA have agreed to chart the frequency for the range on the VFR sectional chart to allow pilots to interact directly with the Marines to coordinate transition through the airspace.

AOPA recognizes the proposed change in airspace designation and relocation of the western SUA boundary will minimally impact the majority of general aviation users transiting this complex airspace area. We encourage the Marines to continue the positive working relationship with local airspace users and the real-time coordination of the airspace above Camp Pendleton so that all users continue to be accommodated.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi J. Williams", with a long horizontal flourish extending to the right.

Heidi J. Williams

Manager

Air Traffic, Regulatory & Certification Policy